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May 25, 2022

**VIA ECF**

Hon. John G. Koeltl, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*June 2, 2022 Conference  
is canceled. Parties should  
provide a notice of dismissal  
or a status update by July 18, 2022,  
so ordered.*

RE: *Par Plumbing Co., Inc. v. Travelers Indemnity Company*  
Civil Action Nos. 1:22-cv-02308 (JGK)  
Letter Motion Requesting Adjournment

*per 6/6/22  
U.S.D.J.*

*5/25/22*

Dear Judge Koeltl:

The parties submit this joint letter-motion pursuant to Rule 1(E) of Your Honor's Individual Practices. The parties respectfully request an adjournment of the Initial Conference scheduled for June 2, 2022 and the Rule 26(f) report for 45 days as the parties are finalizing a resolution to this matter.

Plaintiff Par Plumbing Co., Inc. ("Par Plumbing") commenced this action seeking a declaratory judgment directing Defendant Travelers Indemnity Company to defend and indemnify Par Plumbing in connection with the personal injury action filed by Paul Cotto and Susan Cotto in the Supreme Court of the State of New York in New York County under Index No. 157456/2019. (Doc. No. 1).

The parties have reached an agreement concerning the additional insured coverage and defense of Par Plumbing in the personal injury action. Upon receipt and deposit of the agreed settlement amount between the parties, Par Plumbing will voluntarily dismiss this action pursuant to Rule 41 as the issues concerning indemnity are being reserved by the parties.

Based upon the foregoing, the parties respectfully ask that the Initial Conference set for June 2, 2022 be adjourned to July 18, 2022, or in the alternative, the parties provide the Court a status update on the settlement by that date if dismissal is not filed.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/Jason Myers

Jason Myers, Esq.  
Counsel for Plaintiff

/s/ Tung Wong  
Tung Wong, Esq.  
Counsel for Defendant